

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

F & V CORPORATION, d/b/a  
BULLETPoint MOUNTING SOLUTIONS

Plaintiff,

v.

67 DESIGNS, LLC *et al.*

Defendants.

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Case No. 3:22-cv-00607

Judge Jack Zouhary

**UNOPPOSED MOTION TO CONTINUE ANSWER DEADLINE**

Defendants, 67 Designs, LLC and Wild West Investments, LLC (“Defendants”), through counsel, respectfully seek a continuance of their deadline to answer Plaintiff’s Verified Amended Complaint, and in support would show the Court:

1. Plaintiff filed a Verified Amended Complaint on June 6, 2022. [Dkt. # 28]. Among other things, the Verified Amended Complaint added a new Defendant, Gavin Stener. Undersigned counsel accepted service for Mr. Stener on June 13, 2022. Mr. Stener intends to file a responsive pleading within twenty-one days of accepting service, meaning by Tuesday July 5, 2022. *See* F. R. Civ. Pro. 12(a)(1)(A).

2. Under Rule 15, the Defendants previously served (67 Designs and Wild West) must respond to the Verified Amended Complaint within 14 days of service, making their Answer or other responsive pleading due today, June 21, 2022 (due to the deadline following on the federal Juneteenth holiday). *See* F. R. Civ. Pro. 15(a)(3).

3. In order to allow all three Defendants to answer or otherwise respond to the Verified Amended Complaint on the same date, Defendants respectfully move to continue the answer deadline for 67 Designs and Wild West Investments by 14 days, to July 5, 2022.

4. This motion is not brought for delay or any other improper purpose, but so that justice may be done. Good cause therefore exists to grant the requested relief.

5. Counsel for Defendants have conferred with counsel for Plaintiff, who confirmed that Plaintiff is unopposed to the relief sought in this motion.

Respectfully Submitted,

/s/ James E. Sherry

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***Attorneys for Defendants***

**CERTIFICATE OF CONFERENCE**

I certify on June 20, 2022, I personally conferred with counsel for Plaintiff, who confirmed that Plaintiff is unopposed to the relief requested in this motion.

*/s/ James E. Sherry*

James E. Sherry

*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically this 21<sup>st</sup> day of June, 2022. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ James E. Sherry  
James E. Sherry  
*Attorney for Defendant*